

KEVIN EDWARD WHITE & ASSOCIATES

Attorneys & Counselors at Law

77 West Wacker Drive
Suite 4800

Chicago, Illinois 60601

Telephone (312) 606-8602 • Facsimile. (312) 606-8603

OFFICE OF THE
GENERAL COUNSEL

2006 AUG 25 A 9:31

KEVIN E WHITE

(KWHITE@KEVINEDWARDWHITEASSOCIATES.COM)

August 15, 2006

Office of the General Counsel
FEDERAL ELECTIONS COMMISSION
999 E. Street, NW
Washington, DC 20463
Attention: Ms. Retha Dixon

MUR # 5802

Re: Rahm Emanuel / IGA-32

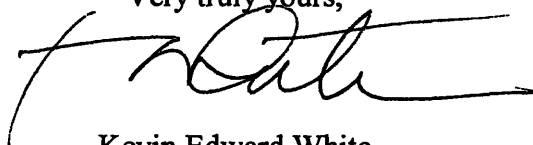
Dear Sir or Madame:

By letter dated August 3, 2006, I forwarded to the Commission the grounds I had for contending that my Congressman, Rahm Emanuel, has involved himself directly in the unfolding scandal here in Chicago regarding the use of City of Chicago resources in the political campaigns of state and federal office holders, including Congressman Emanuel.

Enclosed and for your convenience please find a set of the materials I previously forwarded.

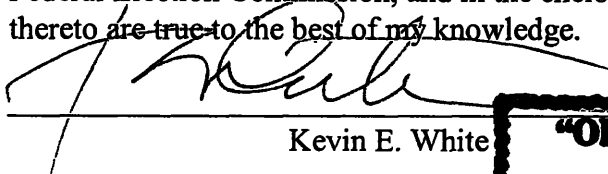
By letter of August 9, 2006, a copy of which I also am enclosing, you advised that my allegations had to be sworn to and my signature notarized. I am providing to you below the requested notarized verification.

Very truly yours,



Kevin Edward White

The undersigned, duly sworn and under oath states that the facts described in my letter of August 3, 2006 to the Federal Election Commission, and in the enclosures thereto are true to the best of my knowledge.

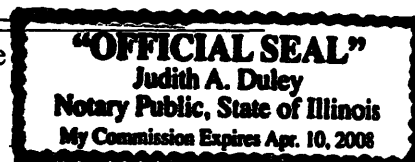


Kevin E. White

Enclosures

State of Illinois
County of Cook

Sworn and subscribed before me this 15th day of AUGUST, 2006.


Notary Public

27044173417

KEVIN EDWARD WHITE & ASSOCIATES

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Suite 4800
Chicago, Illinois 60601
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KEVIN E. WHITE
(KWHITE@KEVINEDWARDWHITEASSOCIATES.COM)

August 3, 2006

Office of the General Counsel
FEDERAL ELECTIONS COMMISSION
999 E. Street, NW
Washington, DC 20463

Re: Rahm Emanuel / IGA-32

Dear Sir or Madame:

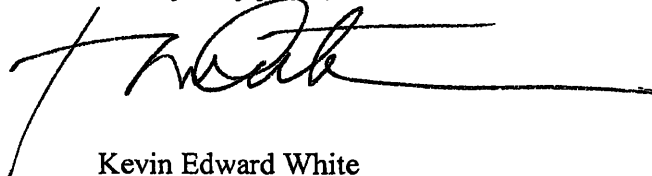
In the enclosed copy of a letter

I outlined grounds for believing that my Congressman, Rahm Emanuel, has involved himself directly in the unfolding scandal here in Chicago regarding the use of City of Chicago resources in the political campaigns of state and federal office holders.

As I state in my letter to Emanuel campaign has never reported its extensive use of these resources as "in-kind" donations to the FEC, or otherwise tracked them to determine whether they exceed contribution limits, his conduct in this regard may also give rise to claims for violations of federal campaign finance laws and regulations. The dollar value of these in-kind contributions of course would be very substantial. however, to the extent that the

Enclosed please find copies of the same materials that we have submitted to me. Please do not hesitate to contact me if there is anything else you need from

Very truly yours,



Kevin Edward White

Enclosures

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Attorneys & Counselors at Law

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Suite 4800

Chicago, Illinois 60601

Telephone (312) 606-8602 • Facsimile (312) 606-8603

KEVIN E WHITE

(KWHITE@KEVINEDWARDWHITEASSOCIATES.COM)

August 3, 2006

Re: Rahm Emanuel / IGA-32

Dear

Congressman Rahm Emanuel's intentional, premeditated and pervasive misuse of City of Chicago resources on his most recent re-election campaign this past fall, here in the Fifth Illinois Congressional District. That City of Chicago resources were used unlawfully on previous Emanuel campaigns, in 2002 and 2004, is by now well-documented. Congressman Emanuel has denied knowledge of that wrongdoing

New documents you made public recently, namely Exhibit IGA-32 coupled with other information already public shows that last fall Emanuel's campaign again misused such resources. This time, and for the reasons stated below, it is not credible that Emanuel had no knowledge of this wrongdoing.

Some context is appropriate. For the last two years, one report after another has described how City of Chicago resources have been misused in the political campaigns of powerful politicians, including Mr. Emanuel. Additional details were provided in the multiple indictments

Further, as those indicted come to trial, the worst of the government's allegations of wrongful conduct are being verified under oath. Most recently, the unanimous jury verdict obtained in the Robert Sorich trial confirmed that this misuse of city resources was unlawful.

As evidence of this misuse of city resources was coming to light, and particularly after his own campaigns were mentioned as among those that had been misusing such resources, Rahm Emanuel denied knowing that he was ever a beneficiary of such corruption. He also contended repeatedly that no politician, even Mayor Daley himself, could be excused for not knowing what goes on in his own campaign. And he has contended that had he known of such

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August 3, 2006

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City of Chicago resources being improperly used in his campaign, he never would have approved of it.

Our analysis strongly suggests that Emanuel's claimed disapproval and lack of knowledge of these practices in his own campaigns may have been disingenuous. Exhibit IGA 32 identifies some 5,500 City of Chicago employees whose city jobs, according to uncontradicted testimony at the Sorich trial, among other things depended on their willingness to work on political campaigns for candidates they did not even know. When the Sorich Clout List was made public, my campaign reviewed Emanuel's petitions for Clout List names among his petition circulators and petition notaries.

We found that

- The first and last names of at least 40 of the supposed "volunteers" that were circulating petitions for Congressman Emanuel last Fall match first and last names of individuals who appear on the Robert Sorich "Clout List" as politically sponsored City of Chicago employees of the kind who, had been "farmed out" in the past to work on political campaigns, including Emanuel's. If we had access to a more accurate list of City of Chicago employees, even more such matches would be found.
- The last names of at least 90 of Rahm Emanuel's "volunteers," including some quite unique, also appear repeatedly on the Robert Sorich "Clout List."
- If the repeated instances of the less common last names on the Robert Sorich "Clout List" that match the less common last names on Emanuel's nomination petitions also turn out to be City of Chicago employees, or if City of Chicago employees are related to such Emanuel "volunteers," then it is at least possible that many more of the persons who were circulating Rahm Emanuel's petitions last fall were tied directly to people who were employed by the City of Chicago and whose names had also appeared on the Robert Sorich Clout List.

The nature of the work being done on the campaign last fall also corresponds to the kind of political work that witnesses in the Sorich trial and elsewhere have testified city employees were directed to do. The addresses of signatories indicate door-to-door, block-by block work. The signatures of the collectors themselves, on the vast majority of the petitions

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August 3, 2006

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Emanuel turned in, were dated across weekends, and notarized on Mondays. Even several of the notaries, according to Exhibit IGA 32, were City of Chicago employees.

Emanuel's campaign generated 450 petitions, far in excess of what he needed. Given his ties to the District are so tenuous (Emanuel only moved here shortly before his first campaign, has little presence here, and grew up in Wilmette), how else but with a "motivated" force of city workers could he have circulated so many petitions in so short a period of time?

Summary exhibits (I and II) of what we found are enclosed. The enclosed disk contains copies of the Emanuel filing petitions where matches were found and a copy of the Robert Sorich Clout List. We have a complete set of the Emanuel petitions filed late last year, if they would be of use to you.

Plainly, if Emanuel was a knowing beneficiary of the wrongdoing you have been alleging, significant and serious legal jeopardy would attach. If Emanuel deliberately avoided knowledge of it, then under an "ostrich" instruction serious legal jeopardy also could attach. Finally, if Emanuel's use of City of Chicago resources were in-kind donations to his political campaign, under Federal and State of Illinois election law, his failure to report them also would have serious legal consequences.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kevin White", with a long horizontal flourish extending to the right.

Kevin Edward White

Enclosures

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As of Thursday, August 03, 2006

Robert Sorich Trial Exhibit IGA -32
“Clout List” vs. Rahm Emanuel October November 2005
Nominating Petitions Analysis¹-Part I

Number	Name of Petition Collector	√ = First and last name match to “Clout List” (Exhibit IGA-32);	Petition Number(s).
1.	Ainsworth, John W.	√	50
2.	Bairstow, James L.	√	420, 422, 423
3.	Balcsik, Michael	√	159, 160
4.	Callahan, Patrick	√	180
5.	Cedre, Francisco J.	√	15,16,41
6.	Cione, Lawrence	√	366
7.	Collins, Michael J.	√	60, 245
8.	Crowe, Dan	√	196, 197
9.	Davison, Paul	√	340
10.	Digiovanni, Dino	√	85, 239
11.	Drew, Anthony	√	351
12.	Egan, James J.	√	416, 417
13.	Grosso, Anthony	√	179
14.	Hedlund, Neil	√	163
15.	Horvath, Robert	√	204, 237
16.	Karson, Joseph S.	√	96, 97, 98, 99
17.	Kelly, Patrick	√	151, 152, 153, 154, 223
18.	Kiefer, Richard	√	101, 102, 103, 104, 105
19.	Koldan, Anthony W	√	226
20.	Maize, Richard	√	185, 209
21.	Mason, Thomas	√	224
22.	McDermott, Robert T.	√	225
23.	Miller, Glenn	√	311
24.	Miller, Ted	√	436, 437

¹ Not included in this summary are three Emanuel notaries whose names also appeared on the “Clout” list, “Shirley Bonet,” “Mary McDonnell Bourne,” and Warren G. Weaver.”

Rahm Emanuel / Robert Sorich
City of Chicago Payroll "Clout List 5,500"

Number	Name of Petition Collector	√ = First and last name match to "Clout List" (Exhibit IGA-32);	Petition Number(s).
25	Monsen, John	√	231
26	Montano, Jose	√	35
27	Mooney, John J. (Jack)	√	252
28	Moore, James F.	√	212
29	Mussen, Daniel J.	√	58, 219
30	Navarro, Jesus	√	292
31	O'Donnell, Thomas M.	√	34, 278
32	Rehder, Richard	√	335
33	Ryan, Thomas M.	√	206, 208
34	Sberno, Mike	√	290, 383, 384, 385, 386
35	Scienski, Steven J., Sr.	√	368, 369
36	Sikanich, Charles	√	220
37	Spalding, Andrew	√	199, 200, 201
38	Stroka, Jeffrey	√	165, 166
39	West, James	√	42, 117, 118
40	Wurtz, Dwaine	√	341, 342, 344

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As of Thursday, August 03, 2006

**Robert Sorich Trial Exhibit IGA-32
("Clout List") vs. Rahm Emanuel October November 2005
Nominating Petition Analysis-Part II**

Number	Name of Petition Collector	Times Identical Surname Appears on "Clout List"	Petition No(s).
1.	Ainsworth, John W.	1	50
2.	Bairstow, James L.	2	420, 422, 423
3.	Balcsik, Michael	1	159, 160
4.	Barreiro, Stacey	1	214, 215, 216, 217, 218
5.	Bonner, James	3	52
6.	Bono, Robert M.	1	137, 144, 145, 146, 147
7.	Burke, Kathleen	5	336, 337
8.	Butler, Nora	5	78, 79
9.	Callahan, Patrick	5	180
10.	Campbell, Kevin	7	74, 84, 86, 95
11.	Canavan, Paul	1	229
12.	Cantillon, James P.	1	412
13.	Caruso, Leslie	38	421
14.	Casey, Martin J.	3	7, 8
15.	Cedre, Francisco J.	3	15, 16, 41
16.	Cintron, Uriel	1	192
17.	Cione, Lawrence	3	366
18.	Coconate, Gabe	3	378, 379, 380
19.	Collins, Michael J.	14	60, 245
20.	Corcoran, Thomas E.	1	181, 182
21.	Cosgrove, Thomas	1	411
22.	Crowe, Dan	2	196, 197
23.	Davison, Paul	1	340
24.	Delgado, Rafael	6	375, 376, 377
25.	DeRango, Luigi	1	298, 345, 346
26.	Digiovanni, Dino	1	85, 239
27.	Divincenzio, Paul	1	68, 83
28.	Drew, Anthony	1	351
29.	Egan, James J.	3	416, 417
30.	Erickson, Carl	1	29, 123

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Rahm Emanuel / Robert Sorich
"Clout List" Analysis

Number	Name of Petition Collector	Times Identical Surname Appears on "Clout List"	Petition No(s).
31.	Figueroa, Mitchell	2	316, 317, 318
32.	Fitzgerald, Garrett	4	5, 6
33.	Flaherty, Patrick	1	195
34.	Foster, George	7	175
35.	Fugiel, Alan	1	312
36.	Gonzales, Daniel	4	401
37.	Goodman, David	1	282
38.	Gordon, George	7	111, 112, 260, 261, 262, 288
39.	Grosso, Anthony	1	179
40.	Hansen, Ednaly	2	28
41.	Hayes, David F.	7	352
42.	Hedlund, Neil	1	163
43.	Heneghan, Ann M.	1	210
44.	Hernandez, Miguel	10	313, 314
45.	Hodges, James G.	1	203
46.	Horvath, Robert	1	204, 237
47.	Karson, Joseph S.	1	96, 97, 98, 99
48.	Kelly, Patrick	26	151, 152, 153, 154, 223
49.	Kiefer, Richard	2	101, 102, 103, 104, 105
50.	Koldan, Anthony W	1	226
51.	Lawson, Bennett	1	186, 187
52.	Luna, Dan	2	286
53.	Lyons, Joseph M.	6	213, 234
54.	Madison, Robert H.	5	3, 4, 45
55.	Malone, Gerald	3	173, 230
56.	Maize, Richard	1	185, 209
57.	Martinez, Gilbert	18	299, 300, 301, 348, 320
58.	Mason, Thomas	2	224
59.	Matassa, Frank	1	397
60.	McDermott, Robert T.	2	225
61.	Mercado, Rosendo	2	403
62.	Miller, Glenn	9	311
63.	Miller, Ted	1	436, 437
64.	Monsen, John	1	231
65.	Montano, Jose	1	35
66.	Mooney, John J. (Jack)	2	252
67.	Moore, James F.	13	212

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Rahm Emanuel / Robert Sorich

“Clout List” Analysis

Number	Name of Petition Collector	Times Identical Surname Appears on “Clout List”	Petition No(s).
68.	Mussen, Daniel J.	2	58, 219
69.	Navarro, Jesus	7	292
70.	O’Connell, Kevin	1	14
71.	O’Connor, Beverly	1	172
72.	O’Connor, Maurice T.	1	162
73.	O’Donnell, Thomas M.	1	34, 278
74.	Palumbo, Michael S.	1	81, 394, 395
75.	Pollok, Louise	1	281
76.	Rehder, Richard	2	335
77.	Rice, John A.	3	319
78.	Rooney, William J(?).	1	82
79.	Rosa, Frank C.	3	392
80.	Ryan, Thomas M.	17	206, 208
81.	Sanders, Gene O.	6	305, 309, 310
82.	Sberno, Mike	1	290, 383, 384, 385, 386
83.	Schroeder, Michael J.	1	222
84.	Scienski, Steven J., Sr.	1	368, 369
85.	Shapiro, Diane S.	2	249
86.	Sikanich, Charles	1	220
87.	Smith, Christian M.	11	46
88.	Sowa, Robert P.	2	235
89.	Spalding, Andrew	1	199, 200, 201
90.	Stroka, Jeffrey	1	165, 166
91.	Sweeney, Thomas J.	4	67, 73
92.	Tierney, Kathleen	2	255
93.	Watson, Mechie	7	47
94.	Weaver, Casey Ryan	1	266
95.	Weaver, Yolanda P.	1	1, 263, 264
96.	West, James	3	42, 117, 118
97.	Wurtz, Dwaine	1	341, 342, 344
98.	Zook, Theodore	1	347

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